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February 20, 2007

Ex Parte

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 06-150, 700 MHz Service Rules
WT Docket No. 06-169, 700 MHz Guard Band Rules

Dear Ms. Dortch:

On February 15, 2007, Michael Samsock and Charla Rath of Verizon Wireless met with John Branscome, Acting Legal Advisor to Commissioner Michael J. Copps, to discuss the company's positions in the above-captioned proceedings, as expressed in our previous filings.

Verizon Wireless believes that, with minor exceptions outlined in our comments and ex partes, the FCC should not change its 700 MHz service rules. In particular, we discussed Verizon Wireless' view that by keeping the existing band plan of regional licenses, the Commission will avoid an inefficient auction result and years of carriers attempting to obtain the necessary bandwidth and coverage through post-auction, secondary market transactions.

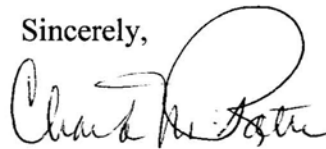
We also noted that Verizon Wireless continues to oppose as unnecessary, administratively burdensome and counterproductive the adoption of new rules that would dictate where licensees must provide service or that would reclaim "unused" portions of a geographic licensee. Such rules would be counter to valid, longstanding Commission policy that offers licensees flexibility to respond to the market, a policy that has helped to deliver digital voice and data services to most of the U.S. population. Should the Commission determine to change its current performance requirements for licenses in the 700 MHz band, we suggested that the Commission adopt a "safe harbor" approach, similar to what it adopted in 2004 for other services operating in different spectrum

bands.¹ Under the approach we outlined, a licensee would be deemed to have met the substantial service requirement if at license renewal it (1) covers two-thirds of the population of the licensed area, or (2) covers 75% of the geographic area of at least 20 percent of the rural areas in its licensed area. The Commission would also state that it will consider other factors in determining satisfaction of substantial service.

In addition, we noted Verizon Wireless' concerns about making changes to the Guard Band rules that would increase the potential for interference to public safety and/or reduce the effective use of commercial spectrum in the band.

Pursuant to section 1.1206(b)(2) of the Commission's rules, an electronic copy of the letter is being filed for inclusion in the above-referenced dockets. Please direct any questions regarding this filing to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charla M. Rath', with a large, stylized loop at the end.

Charla M. Rath

cc: John Branscome

¹ See *Facilitating the Provision of Spectrum-Based Services to Rural Areas and Promoting Opportunities for Rural Telephone Companies to Provide Spectrum Based Services*, WT Docket No. 02-381, Report and Order and Further NPRM, FCC 04-166 (rel. Sept. 27, 2004) at paras. 75-84.